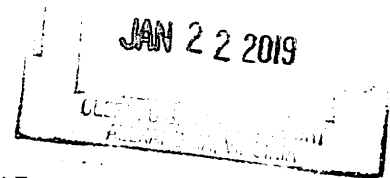


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	UNDER SEAL
)	
v.)	Case No. 1:19-MJ-31
)	
MARKEE ALEXANDER BROWN,)	
)	
Defendant.)	

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Russell J. Tonks, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the United States Secret Service ("USSS"), and have been since April 2016. Since working for the USSS, I have completed the Criminal Investigator Training Program located at the Federal Law Enforcement Training Center in Glynco, Georgia and the Special Agent Training Course at the USSS Rowley Training Center in Beltsville, Maryland. During the latter training, I received several weeks of instruction on counterfeit U.S. Currency investigations, including understanding the genuine U.S. Currency printing process. Prior to joining the USSS, from 2011 until 2016, I was employed as a Police Officer for the Baltimore City Police Department in Baltimore, Maryland.

2. I am currently assigned to USSS Washington Field Office's ("WFO") Counterfeit Investigation Squad. My assignments include investigating individuals who are involved in the manufacture, possession, passing, and transferring of counterfeit United States Currency. Since my employment with the USSS, I have participated in numerous state and federal investigations resulting in the arrest and conviction of individuals involved in counterfeiting U.S. Currency. During these investigations, I have analyzed phone subscriber records and internet records, and

participated in the search and seizure of electronic devices, including cellular phones and “smart” phones.

3. I submit this affidavit in support of a criminal complaint and arrest warrant charging Markee Alexander Brown (“BROWN”) with passing and possessing counterfeit obligations or securities of the United States, in violation of Title 18, United States Code, Section 472.

4. The facts in this affidavit come from my personal observations, my training and experience, and information and evidence obtained from other agents, law enforcement officials and witnesses. All observations I did not personally make were related to me by the individuals who made them, or come from my review of records, documents, and other physical evidence obtained during the course of this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

5. This investigation came to the attention of the USSS in September 2018 because various local police departments in Washington, D.C., Maryland and Virginia notified the WFO of counterfeit passes and incidents involving the same serial number printed on the counterfeit Federal Reserve Notes (hereinafter “FRNs”). Between September 11 and 17, 2018, the USSS was alerted to 11 separate incidents reported to local police departments involving the serial number “MB22783601E” (hereinafter “SN-1”) being printed on counterfeit FRNs passed at local small businesses. During this time, the USSS began compiling and tracking incidents that involved SN-1. Photos, videos, and suspect descriptions forwarded from the stores and/or local police

departments from these incidents repeatedly showed one particular black male, with an average build, short hair, and facial hair.

6. On September 27, 2018, Alexandria Police Department (“APD”) notified the WFO of an individual they had in custody for passing counterfeit U.S. currency at several locations in Alexandria, Virginia. APD advised that the suspect, identified as BROWN, was arrested shortly after passing counterfeit FRNs at two local businesses. On that date, BROWN entered a One Life Fitness, located in Alexandria, Virginia, within the Eastern District of Virginia, and purchased merchandise with one counterfeit \$100 FRN. During this transaction, BROWN was tendered genuine U.S. Currency as change. Your affiant’s review of surveillance footage of this transaction at One Life Fitness identified BROWN as the perpetrator.

7. Later, on September 27, 2018, BROWN entered an American Automobile Association (“AAA”) store, located in Alexandria, Virginia, within the Eastern District of Virginia, and attempted to purchase merchandise. Store employees did not believe the FRNs passed by BROWN were genuine, inspected them, and questioned BROWN, which resulted in BROWN exiting the store without making a purchase. After several calls were placed to 911 in reference to these counterfeit passes, APD patrol officers were able to locate BROWN, who matched the description given by AAA store employees, at a nearby metro station. A AAA employee was escorted to the scene of BROWN’s investigative stop and confirmed during a show-up that BROWN was the individual who attempted to pass the suspected counterfeit FRN at AAA. In addition, your affiant reviewed snapshot photographs from the surveillance footage at AAA of this transaction, which identified BROWN as the perpetrator.

8. APD’s search of BROWN’s person incident to his arrest recovered five counterfeit FRNs, all bearing serial number LF11971877E (hereinafter “SN-2”). SN-2 was identical to the

FRNs passed at the two incident locations in Alexandria, Virginia on the evening of September 27, 2018. APD also seized a red iPhone from BROWN incident to his arrest.

9. On September 27, 2018, the USSS responded to APD, to assist in APD's investigation of BROWN. The responding USSS agent was able to conduct a preliminary examination of the recovered suspected counterfeit FRNs. The recovered FRNs were missing several security features present in genuine U.S. currency, therefore, confirming they were counterfeit. The USSS agent present observed BROWN's booking photos and interview at APD and was able to identify BROWN as the same individual who the USSS had previously observed on surveillance videos passing counterfeit FRNs at various locations in the Washington, D.C. metropolitan area earlier in September 2018.

10. Further investigation by APD revealed that BROWN was identified passing counterfeit FRNs at two other locations in Alexandria, Virginia, within the Eastern District of Virginia, on the evening of September 27, 2018. Specifically, BROWN was identified, via a matching suspect description, passing one counterfeit \$100 FRN at a Foster's Grill and attempting to pass a counterfeit FRN at a Paisano's, both restaurants located in Alexandria, Virginia. The FRN recovered from the Foster's Grill restaurant was SN-2. Your affiant reviewed snapshot photographs from the surveillance footage at Paisano's of the transaction, which identified BROWN as the perpetrator. At Paisano's, BROWN attempted to pass one \$100 FRN but was denied by employees who suspected the note was counterfeit. BROWN left the store with the suspect FRN.

11. On October 16, 2018, \$500 in counterfeit FRNs were passed at a Lululemon store in Alexandria, Virginia, within the Eastern District of Virginia. The USSS was later notified of this incident and identified the suspect as BROWN after reviewing surveillance footage of the

transaction turned over to the USSS by Lululemon. The FRNs passed and recovered in this incident, all bearing S/N: LF95399606G (hereinafter "SN-3"), are identical to FRNs recovered at two other locations in Maryland where BROWN was identified via video surveillance passing counterfeit currency. These other two incidents occurred on October 5, 2018 and October 8, 2018.

12. On December 20, 2018, BROWN was identified by USSS agents, via store surveillance video, passing counterfeit FRNs in exchange for merchandise at a Lululemon store in Gaithersburg, Maryland. This incident occurred at approximately 5:13 p.m. At approximately 5:39 p.m. on the same day, AT&T call detail records for BROWN's phone show that BROWN's phone engaged in a text message communication utilizing a cell tower directly in range of this store.

13. On December 28, 2018, BROWN was identified by USSS agents, via store surveillance video, passing counterfeit FRNs at Christoph Salon in NW Washington, D.C. This incident occurred between approximately 11:00 a.m. and 1:00 p.m. AT&T call detail records show that BROWN's phone made numerous calls and texts utilizing the cell tower in the direct vicinity of Christoph Salon at approximately 11:40 a.m.

14. The USSS has also obtained a large amount of counterfeit FRNs bearing the same identifiers as those linked to BROWN from local businesses, banks, and cash carrier companies. These include SN-1, SN-2, SN-3, and several others. In most circumstances, when a business is handed counterfeit FRNs during a transaction, the business's employees may not recognize the notes as being counterfeit and, therefore, forward the counterfeit notes on to their bank either directly or via a cash carrier. In these instances, the bank and cash carrier may flag specific notes as being counterfeit and forward them to the USSS for investigation. When this occurs, the

business's account may incur a loss equal to the value of the counterfeit removed from their deposit.

15. An NCIC/NLETS search revealed that BROWN has previously been arrested for passing counterfeit U.S. Currency on multiple occasions. For example, in July 2017, BROWN was arrested with Joseph Andre Robinson (hereinafter "Robinson") for passing counterfeit U.S. currency in La Plata, Maryland. Both BROWN and Robinson received a disposition of guilty in this case and served probation as a result.

16. On September 17, 2018, Robinson was identified via surveillance footage, passing one counterfeit \$100 FRN at an ice cream store in Bethesda, Maryland. The serial number on that counterfeit FRN was SN-1, which BROWN also passed at several locations throughout September 2018.

17. On October 10, 2018, Robinson was identified by USSS agents via surveillance footage passing counterfeit U.S. currency at a Lululemon store and a Salon 46 store, both located in Alexandria, Virginia, within the Eastern District of Virginia. During these incidents, Robinson passed SN-3, which BROWN also passed at several locations in October 2018. In addition to video evidence at both stores, call detail records obtained by the USSS for Robinson's cell phone, placed Robinson's phone in the area of both locations at the approximate time of each transaction.

18. AT&T subscriber records, driver's licenses, identification cards, and statements and information provided by BROWN and Robinson to law enforcement list BROWN and Robinson's addresses in the same block of Hartford Street SE, Washington, D.C., directly across the street from each other.

19. AT&T call detail records obtained by the USSS for both BROWN's phone number and Robinson's phone number in January 2019 revealed that BROWN and

Robinson have continued to keep in constant contact via cell phone communication since at least August 2018.

20. On January 17, 2018, USSS agents executed federal search warrants at BROWN's and Robinson's residences. Upon entry into Robinson's residence, agents found BROWN sleeping on a couch within Robinson's residence. Some of the items recovered during the search of Robinson's residence included a set of car keys that operate a 2004 Chevrolet Cavalier. BROWN identified the keys to agents as belonging to him. BROWN signed a "consent to search" form and authorized agents to search his vehicle. During a search of this vehicle, agents photographed two Lululemon bags containing Lululemon clothing in the vehicle.

21. In 2018 alone, there are at least eight different serial numbers directly associated with BROWN's unlawful counterfeit passes. The dollar amount of these FRNs that banks and cash carriers have forwarded to the USSS is over \$31,000 and growing by the day. These notes have been passed to businesses in Washington, D.C, Virginia and Maryland. This \$31,000 figure does not include most incidents where associated counterfeit passes were reported to local police departments, but were not forwarded to banks or cash carriers, which totals approximately \$10,000 in additional counterfeit losses associated with BROWN. In total, between 2017 and 2018, BROWN is associated with over \$50,000 in counterfeit currency passed and turned over to the USSS and local police departments. Video surveillance, call detail records and local arrests identify BROWN as the perpetrator in twenty-nine (29) counterfeit passes in Maryland, Washington, D.C. and Virginia in 2017 and 2018.

CONCLUSION

22. Based on the information provided in this affidavit, I submit that probable cause


exists to believe that BROWN did knowingly pass and possess counterfeit obligations or securities of the United States on or about September 27, 2018, among other crimes.

Respectfully submitted,



Russell J. Tonks
Special Agent
United States Secret Service

Subscribed and sworn to before me on January 22, 2019.



/s/
Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa C. Buchanan
United States Magistrate Judge
Eastern District of Virginia